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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA

20 JACQULYN DELANEY,

CASE NO. 3:16-cv-01149-RS

21 Plaintiff,

22 vs.
23 **STIPULATION AND [PROPOSED] ORDER**
REVISING THE COURT'S SCHEDULING
ORDER

24 STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY; and DOES 1
25 through 20,

26 Defendants.

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1 **TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 This stipulation to revise the Court's June 30, 2016 Scheduling Order (Dkt. 16) in the
 3 above-referenced matter is made and entered into by and between plaintiff Jacqulyn Delaney and
 4 defendant State Farm Mutual Automobile Insurance Company ("State Farm"), referred to
 5 collectively as the "Parties."

6 **I.**
 7 **RECITALS**

8 1. WHEREAS, on June 30, 2016, the Court issued its Scheduling Order (Dkt. 16),
 9 setting deadlines for fact discovery, expert discovery, and dispositive motions. The Scheduling
 10 Order set June 7, 2017, as the fact discovery cutoff and August 25, 2017, as the expert discovery
 cutoff.

11 2. WHEREAS, the Parties have not sought any prior extensions to the Court's June 30,
 12 2016 Scheduling Order.

13 3. WHEREAS, the Parties desire to submit this matter to mediation.

14 4. WHEREAS, counsel for Delaney and State Farm have engaged in discussions to set
 15 the parameters for a possible settlement.

16 5. WHEREAS, the Parties believe that mediation would be more productive and more
 17 likely to settle the case if the Parties have additional time to conduct discovery and assess the merits
 18 of the case prior to the mediation.

19 6. WHEREAS, the Parties do not seek any extension of dates currently set by the
 20 Scheduling Order except for the fact discovery cutoff, expert disclosures, and expert discovery
 cutoff.

22 7. WHEREAS, the Parties have been working diligently toward moving this case
 23 forward in an efficient, expeditious manner. The Parties wish to litigate this matter in a cost-
 24 effective manner and avoid unnecessary attorneys' fees and costs.

25 8. WHEREAS, the Parties have tentatively agreed to hold the mediation session by
 26 June 30, 2017, subject to the Court's approval.

27 9. WHEREAS, the Parties have agreed to submit this Stipulation and [Proposed] Order

1 | to Revise the Court's Scheduling Order.

2 10. WHEREAS, the Parties hereby stipulate to revising the Court's June 30, 2016
3 Scheduling Order as follows.

II. STIPULATION

Plaintiff and State Farm hereby stipulate and agree as follows:

1. The Parties agree to the following revisions to the Court's Scheduling Order:

Scheduled Event	Date
Fact Discovery Cutoff	July 24, 2017 (currently June 7, 2017)
Expert Disclosures	August 14, 2017 (currently June 28, 2017)
Rebuttal Expert Disclosures	September 11, 2017 (currently July 28, 2017)
Expert Discovery Cutoff	October 9, 2017 (currently August 25, 2017)
Deadline to Hear Dispositive Motions	September, 7, 2017 (NO CHANGE)
Pre-Trial Conference	November 2, 2017 (NO CHANGE)
Trial Date	November 27, 2017 (NO CHANGE)

IT IS SO STIPULATED.

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1 Dated: March 23, 2017

LAW OFFICE OF EDWARD A. JUDGE

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/s/ Edward A. Judge

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By:

EDWARD A. JUDGE
Attorney for Plaintiff
JACQULYN DELANEY

4

5 Dated: March 23, 2017

HUSKINSON, BROWN & HEIDENREICH

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/s/ David W.T. Brown

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By:

DAVID W.T. BROWN
Attorneys for Plaintiff
JACQULYN DELANEY

9

10

Dated: March 23, 2017

HAYES SCOTT BONINO ELLINGSON & McLAY, LLP

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12

/s/ Jonathan K. Myers

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By:

STEPHEN M. HAYES
STEPHEN P. ELLINGSON
JONATHAN K. MYERS
Attorneys for Defendant
STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY

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Filer's Attestation: Pursuant to Civil Local Rule 5-1(i)(3), Jonathan K. Myers hereby attests that concurrence in the filing of this document has been obtained from each of the other signatories.

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[PROPOSED] ORDER

Pursuant to the stipulated request by all Parties to this action and good cause appearing, the Court ORDERS the deadlines set by the Court's Scheduling Order continued as follows:

Scheduled Event	Date
Fact Discovery Cutoff	July 24, 2017
Expert Disclosures	August 14, 2017
Rebuttal Expert Disclosures	September 11, 2017
Expert Discovery Cutoff	October 9, 2017
Deadline to Hear Dispositive Motions	September, 7, 2017
Pre-Trial Conference	November 2, 2017
Trial Date	November 27, 2017

IT IS SO ORDERED.

Dated: 3/23, 2017



HONORABLE RICHARD SEEBORG
UNITED STATES DISTRICT COURT –
NORTHERN DISTRICT